

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DYANA HESSON,	:	
	:	
Plaintiff,	:	NO. 1:25-CV-0266
	:	JUDGE WILSON
v.	:	
	:	
PLAZA AZTECA MECHANICSBURG, INC., PA GLOBAL, INC., RUBEN LEON, AND JALEL RONIN,	:	ELECTRONICALLY FILED
	:	
Defendants	:	

**THIRD JOINT MOTION TO EXTEND TIME
FOR DEFENDANTS TO RESPOND TO COMPLAINT**

Plaintiff Dyana Hesson and Defendants Plaza Azteca Mechanicsburg, Inc., PA Global, Inc., and Ruben Leon (“Plaza Azteca Defendants”) jointly move for an extension of time for the Plaza Azteca Defendants to respond to Plaintiff’s Complaint. In support of this Motion, Plaintiff and the Plaza Azteca Defendants state as follows:

1. On February 12, 2025, Dyana Hesson filed a Complaint (Doc. 1) against Defendants and a Summons (Doc. 2) was issued thereafter.
2. The Complaint (Doc. 1) was served as follows:
 - a. On March 4, 2025, Defendant Plaza Azteca Mechanicsburg, Inc. was served with the Complaint.

b. On March 7, 2025, Defendant Ruben Leon was served with the Complaint.

c. On March 10, 2025, PA Global, Inc. accepted service of the Complaint through counsel for the Plaza Azteca Defendants.

3. After service with the Complaint, counsel for the Plaza Azteca Defendants requested from Plaintiff's counsel a 30-day extension to review and evaluate the allegations in the Complaint, prepare a response, and obtain local counsel.

4. On March 18, 2025, a Joint Motion for Extension of Time to File an Answer (Doc. 13) was filed ("First Joint Motion").

5. On March 19, 2025, an Order (Doc. 14) was entered which granted the First Joint Motion and provided the Plaza Azteca Defendants until April 9, 2025 to answer, move with respect to, or otherwise respond to Plaintiff's Complaint.

6. Counsel for the Plaza Azteca Defendants began its review and evaluation of the allegations in Plaintiff's Complaint, and obtained the undersigned local counsel who entered his appearance on April 3, 2025 (Doc. 16).

7. On April 4, 2025, Plaintiff's counsel and counsel for the Plaza Azteca Defendants agreed to an additional fifteen (15) day extension for the Plaza Azteca Defendants to answer, move with respect to, or otherwise respond to Plaintiff's Complaint.

8. On April 8, 2025, a Second Joint Motion to Extend Time for Defendants to Respond to Complaint (Doc. 17) was filed (“Second Joint Motion”).

9. On April 8, 2025, an Order (Doc. 18) was entered which granted the Second Joint Motion and provided the Plaza Azteca Defendants until April 24, 2025 to answer, move with respect to, or otherwise respond to Plaintiff’s Complaint.

10. Counsel for the Plaza Azteca Defendants continued its review and evaluation of the allegations in Plaintiff’s Complaint.

11. On April 22, 2025, Plaintiff’s counsel and counsel for the Plaza Azteca Defendants agreed to an additional fifteen (15) day extension for the Plaza Azteca Defendants to answer, move with respect to, or otherwise respond to Plaintiff’s Complaint.

12. This is the third extension requested by the Plaza Azteca Defendants who respectfully request that the Court grant this motion and extend the deadline until May 9, 2025 for the Plaza Azteca Defendants to answer, move with respect to, or otherwise respond to Plaintiff’s Complaint.

WHEREFORE, the Plaza Azteca Defendants and the Plaintiff respectfully request that the Court grant this motion and extend the deadline for the Plaza Azteca Defendants to respond to Plaintiff’s Complaint to May 9, 2025.

Dated: April 23, 2025

Respectfully submitted,

***Counsel for Defendants, Plaza Azteca
Mechanicsburg, Inc., PA Global, Inc., and
Ruben Leon***

METTE, EVANS & WOODSIDE

/s/ John B. Zonarich

John B. Zonarich, Esquire
Identification No. 79989
3401 N. Front Street, 2nd Floor
Harrisburg, Pennsylvania 17110
T: (717) 232-5000
F: (717) 236-1816
E: jbzonarich@mette.com

WILLIAMS MULLEN

/s/ Clinton H. Brannon

Clinton H. Brannon (V.S.B. #72340) (*Pro
Hac Vice Application Forthcoming*)
8350 Broad Street, Suite 1600
Tysons, VA 22102
T: (703) 760-5200
F: (703) 748-0244
E: cbrannon@williamsmullen.com

Counsel for Plaintiff Dyana Hesson

MYERS, BRIER & KELLY, LLP

/s/ Richard L. Armezzani

Daniel T. Brier
Richard L. Armezzani
425 Biden Street, Suite 200
Scranton, PA 18503
dbrier@mbklaw.com
rarmezzani@mbklaw.com

BARDACKE ALLISON MILLER LLP

/s/ Benjamin Allison

Benjamin Allison
Billy Trabaudo
141 E. Palace Avenue
Santa Fe, NM 87501
505-995-8000
ben@bardackeallison.com
billy@bardackeallison.com